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September 6, 2023

Magistrate Judge Cheryl Pollak
U.S. District Court Eastern District of New York

Re: Notice of Bankruptcy Filing
Ortega v. Yagudaev et al

Dear Hon. Court:

This office represents the corporate Defendant Champagne Room Bk Inc in this instant action.

This office *just* uploaded the Notice of Bankruptcy filing and furnished my co-counsel, and adversary with this notice.

I have reviewed her honor's individual rules concerning filing of motions; however, it was not clear whether her honor would require a conference, or a motion, staying discovery as to the corporate defendant in this matter. I believe the automatic stay would preclude any further advancement of this case as against Champagne Room Bk Inc. To what extent a motion is not necessary—I respectfully request this letter be considered a request for a conference on this matter as again, I believe the bankruptcy filed automatically stays this proceeding against the corporate defendant. I would never take the place of the Court's interpretation of bankruptcy stays.

Due to health-related issues I had to withdraw the first application for bankruptcy, and have just today refiled.

Very truly yours,



Victor M. Feraru, Esq.